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December 2, 2016

**VIA ECF & EMAIL**

Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Room 723  
New York, New York 10004-1408  
Email: [bernstein.chambers@nysb.uscourts.gov](mailto:bernstein.chambers@nysb.uscourts.gov)

*Re: Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities LLC, Adv. Pro. No. 08-01789 (SMB): Memorandum Decision Regarding Claims To Recover Foreign Subsequent Transferees*

Dear Judge Bernstein:

We are counsel to Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff. We write to request the extension of certain deadlines following Your Honor’s Memorandum Decision Regarding Claims To Recover Foreign Subsequent Transferees (the “Memorandum Decision”).

As directed by Your Honor, the Trustee’s counsel has conferred with Liaison Counsel for Defendants as well as counsel for Bureau of Labor Insurance (collectively, with the Trustee, the “Parties”) for the purpose of submitting consensual orders consistent with the disposition of the motions filed in each adversary proceeding. The Parties are hopeful that they will reach agreements on consensual orders and not need to settle orders on notice. However, given the number of adversary proceedings at issue, the Parties respectfully request an additional forty-five (45) days—until January 20, 2017—to submit consensual orders or settle orders on notice under Rule 9074-1(a) of the Local Rules of this Court.

Further, while the Parties anticipate submitting consensual, final orders, the Trustee’s counsel has not had the opportunity to discuss the matter with counsel for each individual defendant. As such, out of an abundance of caution, the Trustee also respectfully requests the twenty-one (21) day extension allowed for under Rule 9033(c)—through December 27, 2016—to submit, if

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necessary, written objections under Rule 9033(b) of the Federal Rules of Bankruptcy Procedure to the Memorandum Decision.

Respectfully submitted,

/s/ David J. Sheehan

David J. Sheehan

Partner

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